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6 MELANIE D. MORGAN (Bar No. 8215)
7 TENESA SCATURRO POWELL (Bar No. 12488)
Thomas G. Pasternak (*pro hac vice*)
John M. Schafer (*pro hac vice*)
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thomas.pasternak@akerman.com
11 jay.schafer@akerman.com

12 *Counsel for Defendant Zmodo Technology*
13 *Corporation Limited*

14 **UNITED STATES DISTRICT COURT**

15 **DISTRICT OF NEVADA**

16 EYETALK365, LLC,

17 Plaintiff,

18 v.

19 ZMODO TECHNOLOGY CORPORATION
20 LIMITED,

21 Defendant.

Case Nos. 2:17-cv-02714-RCJ-PAL;
3:17-cv-00686-RCJ-PAL

**MOTION TO SUBSTITUTE RESIDENT
COUNSEL**

22 ZMODO TECHNOLOGY CORPORATION
23 LIMITED,

24 Counter Claimant,

25 v.

26 EYETALK365, LLC,

27 Counter Defendant.

28 //

1 Pursuant to LR 11-6(c), Defendant/Counterclaim Plaintiff Zmodo Technology Corporation,
2 LTD. ("Zmodo") hereby moves this court to substitute local counsel in Case Nos 2:17-cv-02714-
3 RCJ-PAL ("2714 Case") and 3:17-cv-00686-RCJ-PAL ("686 Case"). Zmodo had previously
4 designated Melanie D. Morgan of AKERMAN LLP as associate resident Nevada counsel. (See '2714
5 Case, ECF Nos. 92, 93; '686 Case, ECF Nos. 25, 26) Zmodo now seeks to designate Richard G.
6 Campbell, Jr. of the LAW OFFICE OF RICHARD G. CAMPBELL, JR. INC. as resident counsel. *See* Ex. A.

7 Discovery in this matter does not close until November 16, 2018. (See '2714 Case, ECF
8 No. 111; '686 Case, ECF No. 36). Mr. Campbell has already filed a notice of association of counsel
9 in each case (*see* '2714 Case, ECF No. 106; '686 Case, ECF No. 35), and is thus aware of the
10 respective deadlines set by the Court. Additionally, Thomas G. Pasternak and John M. Schafer of
11 AKERMAN LLP, both of whom have been admitted *pro hac vice* in these cases (*see* '2714 Case, ECF
12 Nos. 94, 95; '686 Case, ECF Nos. 27, 28), will continue to represent Zmodo. Accordingly,
13 discovery and trial deadlines will not be affected by the requested substitution of resident counsel.
14 Therefore, Zmodo respectfully requests that this Court grant the motion to substitute resident
15 counsel.

16
17 Dated: May 18, 2018

18
19 **THE LAW OFFICE OF RICHARD G.**
20 **CAMPBELL, JR. INC.**

21 /s/ Richard G. Campbell, Jr.

22 THE LAW OFFICE OF RICHARD G.
23 CAMPBELL, JR. INC.
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rcampbell@rgclawoffice.com

26 **IT IS SO ORDERED** this 22nd
27 day of May, 2018.

28 
Peggy A. Leen
United States Magistrate Judge

MELANIE D. MORGAN
Bar No. 8215
TENESA SCATURRO POWELL
Bar No. 12488
Thomas G. Pasternak (*pro hac vice*)

1 John M. Schafer (*pro hac vice*)
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10 jay.schafer@akerman.com

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12 *Counsel for Defendant Zmodo Technology*
13 *Corporation Limited*

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was electronically filed this 18th day of May, 2018, using the Court's CM/ECF system and served via email on the following counsel:

Gary R. Sorden (gary.sorden@klemchuk.com)

Michael D. Rounds (mrounds@bhfs.com)

Tim J. H. Craddock (tim.craddock @klemchuk.com)

/s/ John M. Schafer

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14 **UNITED STATES DISTRICT COURT**

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20 LIMITED,

21 Defendant.

Case Nos. 2:17-cv-02714-RCJ-PAL;
3:17-cv-00686-RCJ-PAL

**SUBSTITUTION OF RESIDENT
COUNSEL**

22 ZMODO TECHNOLOGY CORPORATION
23 LIMITED,

24 Counter Claimant,

25 v.

26 EYETALK365, LLC,

27 Counter Defendant.

28 //

1 Pursuant to LR 11-6(c), Defendant/Counterclaim Plaintiff Zmodo Technology
2 Corporation, Inc. hereby substitutes as associate resident Nevada counsel Richard G. Campbell,
3 Jr. of the LAW OFFICE OF RICHARD G. CAMPBELL, JR. INC. in the place and stead of Melanie D.
4 Morgan of AKERMAN LLP.

5 DATED this 9 day of May, 2018



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7 Zmodo Technology Corporation, Ltd.
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9 I consent to the above substitution.
10

11 DATED this ____ day of May, 2018

12 Melanie D. Morgan
13

14 I hereby accept the above and foregoing substitution as associate resident Nevada counsel.
15

16 DATED this ____ day of May, 2018

17 Richard G. Campbell, Jr.
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1 Pursuant to LR 11-6(c), Defendant/Counterclaim Plaintiff Zmodo Technology Corporation,
2 Inc. hereby substitutes as associate resident Nevada counsel Richard G. Campbell, Jr. of the LAW
3 OFFICE OF RICHARD G. CAMPBELL, JR. INC. in the place and stead of Melanie D. Morgan of
4 AKERMAN LLP.

5 DATED this ____ day of May, 2018

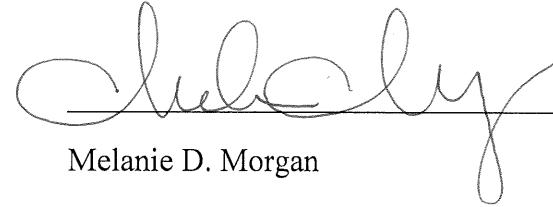
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7 Zmodo Technology Corporation, Ltd.

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9 I consent to the above substitution.

10 DATED this 10th day of May, 2018



11 Melanie D. Morgan

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13 I hereby accept the above and foregoing substitution as associate resident Nevada counsel.

14 DATED this ____ day of May, 2018

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16 Richard G. Campbell, Jr.

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1 Pursuant to LR 11-6(c), Defendant/Counterclaim Plaintiff Zmodo Technology Corporation,
2 Inc. hereby substitutes as associate resident Nevada counsel Richard G. Campbell, Jr. of the LAW
3 OFFICE OF RICHARD G. CAMPBELL, JR. INC. in the place and stead of Melanie D. Morgan of
4 AKERMAN LLP.

5 DATED this ____ day of May, 2018

6

7 Zmodo Technology Corporation, Ltd.

8

9 I consent to the above substitution.

10 DATED this ____ day of May, 2018

11

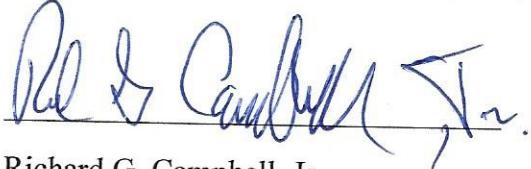
12 Melanie D. Morgan

13

14 I hereby accept the above and foregoing substitution as associate resident Nevada counsel.

15 DATED this 9 day of May, 2018

16



17 Richard G. Campbell, Jr.

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